

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

ATTORNEY MONTHLY FEE STATEMENT COVER SHEET
FOR JULY 1, 2023 THROUGH JULY 31, 2023

In re BlockFi Inc., *et al.*

Applicant: Cole Schotz P.C.

Case No. 22-19361 (MBK)

Client: Debtors and Debtors in Possession

Chapter 11

Case Filed: November 28, 2022

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION
UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746.

RETENTION ORDER ATTACHED.

<u>/s/ Michael D. Sirota</u>	<u>08/10/2023</u>
MICHAEL D. SIROTA	Date

**SECTION I
FEE SUMMARY**

Summary of Amounts Requested for the Period
July 1, 2023 through July 31, 2023 (the “**Compensation Period**”)

Fee Total	\$94,027.50
Disbursement Total	\$2,630.51
Total Fees Plus Disbursements	\$96,658.01

Summary of Amounts Requested for Previous Periods

Total Previous Fees and Expenses Requested:	\$760,756.22
Total Fees and Expenses Allowed to Date:	\$0.00
Total Retainer Remaining:	\$100,000.00
Total Holdback:	\$132,910.35
Total Received by Applicant:	\$538,771.50

Name of Professional and Title	Year Admitted	Hours	Rate	Fee
Michael D. Sirota Member	1986	53.00	\$1,200.00	\$63,600.00
Michael D. Sirota Member	1986	1.50	\$600.00 (Travel)	\$900.00
Warren A. Usatine Member	1995	1.40	\$950.00	\$1,330.00
Felice R. Yudkin Member	2005	18.20	\$705.00	\$12,831.00
Andreas D. Milliaressis Associate	2016	18.30	\$475.00	\$8,692.50
Frances Pisano Paralegal	n/a	18.80	\$355.00	\$6,674.00
TOTALS	n/a	111.20	n/a	\$94,027.50

**SECTION II
SUMMARY OF SERVICES**

Services Rendered	Hours	Fee
Asset Analysis	0.00	\$0.00
Asset/Business Disposition	0.00	\$0.00
Assumption and Rejection of Leases and Contracts	0.20	\$95.00
Preference Actions/Response	0.00	\$0.00
Budgeting (Case)	0.00	\$0.00
Business Operations	3.70	\$3,830.00
Case Administration	19.80	\$17,201.00
Claims Administration and Objections	3.80	\$1,963.00
Corporate Governance and Board Matters	0.00	\$0.00
Data Analysis	0.00	\$0.00
Employee Benefits/Pensions	0.00	\$0.00
Fee Application Preparation	14.60	\$7,010.00
Fee Employment	0.00	\$0.00
Fee Objections	0.00	\$0.00
Financing	0.00	\$0.00
Litigation	11.80	\$6,613.00
Meetings of Creditors	0.00	\$0.00
Disclosure Statement	11.50	\$8,826.00
Plan of Reorganization	42.80	\$46,812.00
Real Estate	0.00	\$0.00
Regulatory Compliance	0.00	\$0.00
Relief from Stay	0.00	\$0.00
Reporting	1.40	\$707.00
Tax Issues	0.10	\$70.50
Valuation	0.00	\$0.00
Non-Working Travel	1.50	\$900.00
SERVICES TOTALS	111.20	\$94,027.50

**SECTION III
SUMMARY OF DISBURSEMENTS**

Disbursements	Amount
Computer Assisted Legal Research	\$0.00
Facsimile	\$0.00
Long Distance Telephone/Conference Calls	\$0.00
In-House Reproduction	\$9.40
Outside Reproduction	\$0.00
Outside Research	\$0.00
Filing Fees	\$350
Court Fees	\$0.00
Court Reporting	\$0.00
Travel	\$2,271.11
Delivery Services / Federal Express	\$0.00
Postage	\$0.00
Other (Explain)	\$0.00
Transcripts	\$0.00
Service of Process	\$0.00
DISBURSEMENTS TOTAL	\$2,630.51

**SECTION IV
CASE HISTORY**

- (1) Date cases filed: November 28, 2022
- (2) Chapter under which case commenced: Chapter 11
- (3) Date of retention: January 25, 2023, *nunc pro tunc* to November 28, 2022. See **Exhibit A**.

If limit on number of hours or other limitations to retention, set forth: n/a
- (4) Summarize in brief the benefits to the estate and attach supplements as needed:¹
 - (a) The Applicant provided legal advice to the Debtors and co-counsel regarding local rules, practice, and procedure.
 - (b) The Applicant reviewed, revised, and coordinated the filing and service of complaints, motions and supporting documents, and monthly fee statements.
 - (c) The Applicant reviewed and strategized with the Debtors and their advisors with respect to the disclosure statement and plan of reorganization, including with respect to the mediation and settlement with the Official Committee of Unsecured Creditors.
 - (d) The Applicant provided advice and strategized with the Debtors and their advisors with respect to certain adversary proceedings and related relief, and various operational matters.
 - (e) The Applicant tended to others matters concerning administration of the chapter 11 cases as requested by co-counsel.
 - (f) The Applicant rendered all other services set forth on the invoices attached hereto as **Exhibit B**.²
- (5) Anticipated distribution to creditors:
 - (a) Administration expense: Unknown at this time.
 - (b) Secured creditors: Unknown at this time.

¹ The following summary is intended to highlight the general categories of services the Applicant rendered on behalf of the Debtors and for the benefit of the estates; it is not intended to itemize each and every professional service which the Applicant performed.

² The invoice attached hereto as Exhibit B contains detailed descriptions of the services rendered and expenses incurred by the Applicant during the Compensation Period.

- (c) Priority creditors: Unknown at this time.
- (d) General unsecured creditors: Unknown at this time.
- (6) Final disposition of case and percentage of dividend paid to creditors: This is the eighth monthly fee statement.

Exhibit A

Retention Order



Order Filed on January 24, 2023
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)
COLE SCHOTZ P.C.

Michael D. Sirota, Esq. (NJ Bar No. 014321986)
Warren A. Usatine, Esq. (NJ Bar No. 025881995)
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Proposed Attorneys for Debtors and Debtors in Possession

In re:

BLOCKFI INC., *et al.*,
Debtors.¹

Chapter 11
Case No. 22-19361 (MBK)
(Jointly Administered)

**ORDER APPROVING THE EMPLOYMENT AND RETENTION
OF COLE SCHOTZ P.C. AS NEW JERSEY COUNSEL TO
THE DEBTORS NUNC PRO TUNC TO THE PETITION DATE**

The relief set forth on the following pages, numbered two (2) through seven (7), is hereby
ORDERED.

DATED: January 24, 2023

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".
Honorable Michael B. Kaplan
United States Bankruptcy Judge

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Debtors: BLOCKFI INC., *et al.*

Case No. 22-19361(MBK)

Caption of Order: ORDER APPROVING THE EMPLOYMENT AND RETENTION OF COLE SCHOTZ P.C. AS NEW JERSEY COUNSEL TO THE DEBTORS *NUNC PRO TUNC* TO THE PETITION DATE

Upon the application (the “**Application**”)² of BlockFi Inc. and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), pursuant to sections 327(a), 329, and 330 of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, authorizing the Debtors to employ and retain Cole Schotz P.C. (“**Cole Schotz**”) as their New Jersey counsel in these proceedings *nunc pro tunc* to the Petition Date; and the Court having jurisdiction to decide the Application and the relief requested therein in accordance with 28. U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11* of the United States District Court for the District of New Jersey, dated September 18, 2012 (Simandle, C.J.); and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and notice of the Application having been given as provided in the Application, and such notice having been adequate and appropriate under the circumstances; and it appearing that no other or further notice of the Application need be provided; and upon the Declarations of Michael D. Sirota, Esq. and Zachary Prince in support thereof; and the Court being satisfied that Cole Schotz does not hold or represent any interest adverse to the Debtors, their estates, or their creditors, and is a disinterested person within the meaning of sections 327 and 101(14) of the Bankruptcy Code, and that said employment would be in the best interest of the Debtors and their respective estates, and that the legal

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

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Debtors: BLOCKFI INC., *et al.*

Case No. 22-19361(MBK)

Caption of Order: ORDER APPROVING THE EMPLOYMENT AND RETENTION OF COLE SCHOTZ P.C. AS NEW JERSEY COUNSEL TO THE DEBTORS *NUNC PRO TUNC* TO THE PETITION DATE

and factual bases set forth in the Application establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is **GRANTED** to the extent set forth herein.
2. In accordance with sections 327(a), 329, and 330 of the Bankruptcy Code, the Debtors are hereby authorized and empowered to employ and retain Cole Schotz as their New Jersey counsel in these chapter 11 cases effective as of the Petition Date.
3. Any and all compensation to be paid to Cole Schotz for services rendered on the Debtors' behalf, including compensation for services rendered in connection with the preparation of the petition and accompanying papers, shall be fixed by application to this Court in accordance with sections 330 and 331 of the Bankruptcy Code, such Federal Rules and Local Rules as may then be applicable, and any orders entered in these cases governing the compensation and reimbursement of professionals for services rendered and charges and disbursements incurred. Cole Schotz also shall make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the "U.S. Trustee Guidelines"), both in connection with the Application and the interim and final fee applications to be filed by Cole Schotz in the chapter 11 cases.

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Debtors: BLOCKFI INC., *et al.*

Case No. 22-19361(MBK)

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4. In order to avoid any duplication of effort and provide services to the Debtors in the most efficient and cost-effective manner, Cole Schotz shall coordinate with Haynes and Boone, LLP, Kirkland & Ellis LLP, Kirkland & Ellis International LLP and any additional firms the Debtors retain regarding their respective responsibilities in these chapter 11 cases. As such, Cole Schotz shall use its best efforts to avoid duplication of services provided by any of the Debtors' other retained professionals in these Chapter 11 Cases.

5. Prior to applying any increases in its hourly rates beyond the rates set forth in the Application, Cole Schotz shall provide ten (10) business days' prior notice of any such increases to the Debtors, the United States Trustee, and any official committee appointed in the Debtors' chapter 11 cases and shall file such notice with the Court. All parties in interest retain all rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

6. Cole Schotz (i) shall only bill 50% for non-working travel; (ii) shall not seek the reimbursement of any fees or costs, including attorney fees and costs, arising from the defense of any objections to any of Cole Schotz's fee applications in this case; (iii) shall use the billing and expense categories set forth in the US Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category"); and (iv) shall provide any and all monthly fee statements, interim fee applications, and final fee applications in "LEDES" format to the United States Trustee.

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Debtors: BLOCKFI INC., *et al.*

Case No. 22-19361(MBK)

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7. Upon entry of a Final Order on the Motion to Redact all Personally Identifiable Information [Docket No. 4], Cole Schotz will disclose the information that the Court orders to be unredacted, if any, through a supplemental declaration. Further, if the Court denies the Motion to Seal Confidential Transaction Parties on the Retention Applications [Docket No. 127], Cole Schotz will, through a supplemental declaration, disclose the identities of all counterparties that were filed under seal, and the connections of Cole Schotz to such potential counterparties.

8. Notwithstanding anything in the Application or the Sirota Declaration to the contrary, Cole Schotz shall seek reimbursement from the Debtors' estates for its engagement-related expenses at the firm's actual cost paid.

9. Notwithstanding anything in the Application and the Sirota Declaration to the contrary, Cole Schotz shall (i) to the extent that Cole Schotz uses the services of independent contractors or subcontractors (collectively, the "Contractors") in these cases, pass through the cost of such Contractors at the same rate that Cole Schotz pays the Contractors; (ii) seek reimbursement for actual costs only; (iii) ensure that the Contractors are subject to the same conflicts checks as required for Cole Schotz; (iv) file with this Court such disclosures required by Bankruptcy Rule 2014; and (v) attach any such Contractor invoices to its monthly fee statements, interim fee applications and/or final fee applications filed in these cases.

10. Notwithstanding anything in the Application and Sirota Declaration to the contrary, the parties in interest reserve the right to object to any application for the payment of pre-petition fees to

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Debtors: BLOCKFI INC., *et al.*

Case No. 22-19361(MBK)

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the extent those fees are not specifically related to the preparation and the filing of the Debtors' Chapter 11 Cases.

11. No agreement or understanding exists between Cole Schotz and any other person, other than as permitted by Bankruptcy Code section 504, to share compensation received for services rendered in connection with these cases, nor shall Cole Schotz share or agree to share compensation received for services rendered in connection with these cases with any other person other than as permitted by Bankruptcy Code section 504.

12. Notwithstanding Cole Schotz's Standard Terms of Engagement for Legal Services, the provision that "Our bills are due and payable upon receipt" shall be null and void during the pendency of these bankruptcy cases.

13. Notwithstanding Cole Schotz's Standard Terms of Engagement for Legal Services, during the pendency of the Chapter 11 Cases, Cole Schotz's retainer shall be treated like a security retainer and shall not be drawn down absent Court order.

14. As set forth in Cole Schotz's Standard Terms of Engagement for Legal Services, Cole Schotz's fees and expenses will be considered "earned" at the time they are incurred, notwithstanding the fact that any such amounts shall only be payable as set forth in that certain *Administrative Fee Order Establishing Procedures for the Allowance and Payment of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court* [Docket No. 307] and shall only be allowed upon entry of a Court order allowing them.

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Debtors: BLOCKFI INC., *et al.*

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15. Notwithstanding Cole Schotz's Standard Terms of Engagement for Legal Services, the provision concerning fee disputes is null and void during the pendency of these bankruptcy cases.

16. The Debtors are authorized to take all actions necessary to carry out this Order.

17. To the extent the Application, the Sirota Declaration, or any engagement agreement pertaining to this retention is inconsistent with this Order, the terms of this Order shall govern.

18. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.

Exhibit B

Invoice



BLOCKFI INC.
601 LEXINGTON AVENUE
KIRKLAND & ELLIS
NEW YORK, NY 10112

Invoice Date: August 8, 2023
Invoice Number: 955022
Matter Number: 65365-0001

Re: CHAPTER 11 DEBTOR

FOR PROFESSIONAL SERVICES THROUGH JULY 31, 2023

ASSUMPTION/REJECTION OF LEASE AND CONTRACT **0.20** **95.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/05/23	ADM	REVIEW ORDER RE: THIRD OMNIBUS REJECTION NOTICE AND SUBMIT TO CHAMBERS	0.20	95.00

BUSINESS OPERATIONS **3.70** **3,830.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/03/23	MDS	TELEPHONE FROM ACCOUNTANT M. RENZI RE: REDUCTION OF EXPENSES	0.40	480.00
07/07/23	FRY	REVIEW WALLET OBJECTION (.3); EMAIL TO CO-COUNSEL RE SAME (.1)	0.40	282.00
07/07/23	ADM	REVIEW WALLET HOLDER OBJECTION AND APPLICABLE RULES RE APPLICATION IN LIEU	0.30	142.50
07/07/23	MDS	REVIEW RUN RATE INFORMATION	0.20	240.00
07/11/23	MDS	REVIEW COST CUTTING PROPOSAL	0.50	600.00
07/11/23	MDS	TELEPHONE TO ACCOUNTANT M. RENZI RE: SCHEDULE OF REDUCTION	0.60	720.00
07/11/23	MDS	CORRESP. TO ATTORNEY/CO-COUNSEL J. SUSSBERG RE: COST CUTTING PROPOSAL	0.70	840.00
07/12/23	ADM	REVIEW NOTICE OF REVISED WALLET HOLDER COMFORT ORDER (0.1); EMAIL CORRESPONDENCE WITH CO-COUNSEL KE, F. YUDKIN AND F. PISANO RE: SAME (0.1)	0.20	95.00
07/12/23	MDS	REVIEW OVERHEAD REDUCTION SCHEDULE	0.30	360.00
07/12/23	FRY	CONFERENCE WITH CO-COUNSEL RE WALLET ORDER	0.10	70.50

CASE ADMINISTRATION **19.80** **17,201.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/23	FRY	EMAILS WITH CO-COUNSEL RE STATUS CONFERENCE	0.10	70.50
07/02/23	FRY	REVIEW EMAILS WITH ADVERSARY RE STATUS CONFERENCE	0.20	141.00
07/02/23	FRY	CONFERENCE WITH CO-COUNSEL RE STATUS CONFERENCE	0.50	352.50

Re: CHAPTER 11 DEBTOR
 Client/Matter No. 65365-0001

Invoice Number 955022
 August 8, 2023
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/23	MDS	TELEPHONE FROM ATTORNEY/CO-COUNSEL KE RE: MONDAY HEARING	0.50	600.00
07/03/23	FP	EMAIL TO KROLL RE: SERVICE OF FILED NOTICE OF FILING OF REVISED EXHIBITS TO ORDER APPROVING DISCLOSURE STATEMENT	0.20	71.00
07/03/23	FP	TELEPHONE TO CHAMBERS REQUESTING COPY OF TRANSCRIPT OF 7/3/23 STATUS HEARING (LEFT MESSAGE)	0.20	71.00
07/03/23	MDS	REVIEW OUTLINE FOR COURT APPEARANCE	0.50	600.00
07/03/23	MDS	ATTEND COURT STATUS CONFERENCE	1.00	1,200.00
07/03/23	MDS	TELEPHONE FROM KE RE: POST COURT CALL	0.50	600.00
07/03/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL J. SUSSBERG RE: POST COURT CALL	0.50	600.00
07/03/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL J. SUSSBERG RE: SCHEDULING CONFERENCE	0.50	600.00
07/03/23	FRY	ATTEND SCHEDULING CONFERENCE	0.80	564.00
07/05/23	FP	REVIEW COURT NOTICES AND UPDATE CALENDAR ENTRIES ADJOURNED TO 7/13/23	0.20	71.00
07/05/23	FP	TELEPHONE CALL TO CHAMBERS RE: 7/3/23 HEARING TRANSCRIPT (LEFT MESSAGE)	0.10	35.50
07/05/23	FRY	EMAIL FROM COURT RE SCHEDULING	0.10	70.50
07/05/23	ADM	UPDATE CALENDAR NOTICES	0.10	47.50
07/06/23	FRY	EMAILS WITH CO-COUNSEL RE SCHEDULING FOLLOWING STATUS CONFERENCE	0.10	70.50
07/06/23	FP	REVIEW COURT NOTICES RE: 7/13 HEARING (.10) AND UPDATE CALENDAR (.10)	0.20	71.00
07/06/23	FP	REVIEW SIGNED ORDER SHORTENING TIME RE: COMMITTEE MOTION (.10) AND CALENDAR 7/13 HEARING DATE (.10)	0.20	71.00
07/07/23	FP	REVIEW COURT NOTICE AND CALENDAR HEARING ON OBJECTION RE: WALLET WITHDRAWALS	0.10	35.50
07/08/23	MDS	CORRESP. TO ATTORNEY/CO-COUNSEL J. SUSSBERG RE: COURT FILING	0.60	720.00
07/10/23	ADM	REVIEW EMAILS WITH CO-COUNSEL HB RE FILINGS AND UPCOMING SCHEDULE	0.20	95.00
07/10/23	MDS	CORRESP. TO ATTORNEY/CO-COUNSEL J. SUSSBERG RE: 7/13 HEARING	0.30	360.00
07/10/23	FP	PREPARE AND EFILE DEBTORS MOTION FOR ORDER AUTHORIZING AND APPROVING SETTLEMENT WITH CERTAIN INSIDERS	0.20	71.00
07/10/23	MDS	TELEPHONE FROM CLIENT RE: PREPARATION FOR HEARING WITH CLIENT AND COUNSEL	0.50	600.00
07/10/23	FP	PREPARE AND EFILE DEBTORS PARTIAL OPPOSITION TO COMMITTEES MOTION TO FILE UNREDACTED COPIES	0.20	71.00
07/10/23	ADM	EMAIL CORRESPONDENCE WITH F. YUDKIN RE: FILINGS	0.10	47.50
07/10/23	ADM	CALL WITH F. YUDKIN RE: FILINGS	0.10	47.50

Re: CHAPTER 11 DEBTOR
 Client/Matter No. 65365-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/23	FP	PREPARE AND SEND EMAIL TO KROLL RE: SERVICE OF FILED MOTIONS AND REPLIES	0.20	71.00
07/11/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL KE RE: PREPARATION FOR COURT HEARING	0.70	840.00
07/11/23	FP	CALLS AND EMAILS WITH COURT AND TRANSCRIBER AS TO WHETHER 7/3 HEARING WAS RECORDED	0.20	71.00
07/11/23	FP	PREPARE (.10) AND EFILE (.20) NOTICE OF AGENDA FOR 7/13/2023 HEARINGS; COORDINATE SERVICE (.10)	0.40	142.00
07/11/23	FRY	REVIEW NOTICE OF AGENDA FOR FILING	0.20	141.00
07/11/23	MDS	CORRESP. TO ATTORNEY/CO-COUNSEL M. SLADE RE: COURT HEARING	0.20	240.00
07/11/23	FRY	EMAIL TO COURT RE CASE WEBSITE	0.10	70.50
07/12/23	FP	PREPARE (.20) AND EFILE (.20) NOTICE OF REVISED PROPOSED ORDER ESTABLISHING WITHDRAWALS OF WALLET ASSETS AS FINAL; DOWNLOAD FILED COPIES (.10) AND COORDINATE SERVICE WITH KROLL (.10)	0.60	213.00
07/12/23	FP	PREPARE (.20) AND EFILE (.10) AMENDED AGENDA FOR 7/13 HGS.; PREPARE (.10) AND SEND EMAIL (.10) TO OMNI FOR SERVICE VIA EMAIL ONLY	0.50	177.50
07/12/23	FP	PREPARE (.20) AND EFILE (.20) K&E CNO RE: APRIL MFS	0.40	142.00
07/12/23	FP	PREPARE (.20) AND EFILE (.20) (1) APPLICATION IN LIEU AND (2) PROPOSED ORDER RE: NJ BUREAU OF SECURITIES THIRD EXTENSION; CALENDAR DEADLINES (.10); COORDINATE SERVICE WITH KROLL (.10)	0.60	213.00
07/12/23	FRY	REVIEW AMENDED AGENDA FOR FILING	0.10	70.50
07/12/23	FP	PREPARE (.10) ADJOURNMENT REQUEST RE: ARCH INS. CLAIM AND SUBMIT (.10) TO JUDGE KAPLAN REQUESTING ADJOURNMENT FROM 7/20 TO 9/20; REVIEW COURT NOTICE RESCHEDULING HEARING TO 9/20 (.10) AND ADVISE ATTORNEY (.10)	0.40	142.00
07/12/23	MDS	PREPARE FOR COURT HEARING	0.80	960.00
07/12/23	FRY	EMAIL RE ADJOURNMENT REQUEST	0.10	70.50
07/13/23	MDS	ATTEND COURT CONFERENCE AND COURT HEARING	4.00	4,800.00
07/13/23	FRY	EMAIL TO CHAMBERS RE CONFERENCE SCHEDULING	0.10	70.50
07/14/23	FRY	EMAILS WITH CO-COUNSEL RE SCHEDULING	0.10	70.50
07/14/23	FRY	TELEPHONE TO CHAMBERS RE WALLET AND SCHEDULING ISSUES (.1); EMAIL TO CHAMBERS RE SAME (.1)	0.20	141.00
07/25/23	FRY	EMAILS WITH CO-COUNSEL AND COURT RE SCHEDULING MATTERS	0.20	141.00
07/30/23	FRY	REVIEW AND REVISE AGENDA FOR FILING	0.20	141.00
07/30/23	FP	PREPARE AND EFILE AGENDA FOR 8/1/23 HEARING	0.20	71.00
07/31/23	FP	PREPARE AND EFILE AMENDED AGENDA FOR 8/1/23 HEARING	0.30	106.50
07/31/23	FRY	REVIEW AMENDED AGENDA	0.20	141.00
CLAIMS ADMINISTRATION AND OBJECTIONS			3.80	1,963.00

Re: CHAPTER 11 DEBTOR
 Client/Matter No. 65365-0001

Invoice Number 955022
 August 8, 2023
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/23	FRY	EMAIL WITH CO-COUNSEL RE SCHEDULING OF CLAIMS OBJECTION	0.10	70.50
07/11/23	ADM	REVIEW EMAIL WITH CO-COUNSEL RE: ADJOURNMENT REQUEST (0.1); PREPARE ADJOURNMENT REQUEST RE: ARCH INSURANCE CLAIMS OBJECTION (0.3); EMAIL CORRESPONDENCE WITH CO-COUNSEL HB RE: ADJOURNMENT REQUEST (0.1)	0.50	237.50
07/11/23	FRY	REVIEW ADJOURNMENT REQUEST FOR CLAIMS OBJECTION	0.10	70.50
07/12/23	ADM	EMAIL WITH CO-COUNSEL L. SISSON AND F. YUDKIN RE: ADJOURNMENT REQUEST OF CLAIMS OBJECTION (0.1); EMAIL F. PISANO RE: SUBMISSION TO COURT (0.1)	0.20	95.00
07/13/23	ADM	REVIEW APPLICATION EXTENDING GOVT BAR DATE (0.1); REVIEW APPLICATION EXTENDING 4007 DEADLINE (0.1); SEND TO F. PISANO FOR FILING AND EMAIL CO-COUNSEL RE: SAME (0.1)	0.30	142.50
07/13/23	FP	PREPARE APPLICATION IN LIEU TO EXTEND GOV. BAR DATE (.20); PREPARE PROPOSED CONSENT ORDER (.10); EFILE APPLICATION WITH PROPOSED CONSENT ORDER (.20); COORDINATE SERVICE (.10)	0.60	213.00
07/13/23	FRY	REVIEW APPLICATION TO EXTEND GOVERNMENT BAR DATE	0.20	141.00
07/18/23	FRY	CALL TO CHAMBERS RE SCHEDULING ON CLAIM OBJECTION	0.20	141.00
07/18/23	ADM	PREPARE ADJ. REQUEST REGARDING RESPONSE AND CROSS MOTION OF GERRO (0.4); SEND TO CO-COUNSEL L. SISSON (0.1); FINALIZE AND SUBMIT TO CHAMBERS (0.2)	0.70	332.50
07/18/23	FRY	CALL WITH CO-COUNSEL RE GERRO CLAIM OBJECTION	0.20	141.00
07/19/23	ADM	REVIEW OMNIBUS CLAIMS OBJECTION ORDERS (0.2); PREPARE CORRESPONDENCE TO COURT ENCLOSING SAME (0.2)	0.40	190.00
07/19/23	FRY	TELEPHONE FROM CREDITORS RE CLAIMS	0.20	141.00
07/31/23	ADM	REVIEW EMAIL FROM CO-COUNSEL HB RE: SCHEDULING CLAIMS MATTERS	0.10	47.50

DISCLOSURE STATEMENT **11.50** **8,826.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/03/23	FP	PREPARE (.20) AND EFILE (.20) NOTICE OF REVISED EXHIBITS TO PROPOSED DISCLOSURE STATEMENT	0.40	142.00
07/03/23	FRY	REVIEW REVISED DS EXHIBITS FOR FILING	0.40	282.00
07/05/23	MDS	REVIEW OBJECTIONS TO DISCLOSURE STATEMENT	1.70	2,040.00
07/05/23	FRY	REVIEW OBJECTIONS TO DISCLOSURE STATEMENT	0.60	423.00
07/07/23	FP	REVIEW NOTICE RESCHEDULING HG. ON D/S FROM 7/13 TO 8/16 (.10) AND UPDATE CALENDAR (.10)	0.20	71.00
07/11/23	FP	PREPARE (.10) AND EFILE (.20) NOTICE OF ADJOURNMENT RE: DISCLOSURE STATEMENT HEARING; COORDINATE SERVICE (.10)	0.40	142.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/13/23	MDS	PREPARE FOR COURT HEARING	0.70	840.00
07/13/23	MDS	MEETING WITH CO-COUNSEL BEFORE CONFERENCE COURT HEARING	0.60	720.00
07/21/23	FRY	CALLS AND EMAILS RE SCHEDULING OF NEW DISCLOSURE STATEMENT HEARING	0.20	141.00
07/25/23	FRY	EMAILS TO/FROM CO-COUNSEL RE DISCLOSURE STATEMENT HEARING	0.20	141.00
07/27/23	FRY	ADDRESS ISSUES RE FILING OF AMENDED DISCLOSURE STATEMENT	0.20	141.00
07/27/23	FRY	TELEPHONE FROM CO COUNSEL RE DISCLOSURE STATEMENT	0.10	70.50
07/28/23	FRY	EMAILS TO/FROM CO-COUNSEL RE FILING OF AMENDED DISCLOSURE STATEMENT	0.20	141.00
07/30/23	ADM	REVIEW EMAILS WITH CO-COUNSEL RE: FILING DS MOTION	0.10	47.50
07/30/23	FRY	EMAILS TO/FROM CO-COUNSEL RE DS	0.20	141.00
07/30/23	FP	PREPARE (.30) AND EFILE (.20) SUPPLEMENTAL MOTION CONDITIONALLY APPROVING DISCLOSURE STATEMENT ADEQUACY	0.50	177.50
07/30/23	FRY	REVIEW SUPPLEMENTAL DS MOTION	0.40	282.00
07/31/23	FRY	REVIEW EXHIBITS TO DISCLOSURE STATEMENT	0.40	282.00
07/31/23	FP	PREPARE AND EFILE NOTICE OF FILING OF AMENDED PLAN AND AMENDED DISCLOSURE STATEMENT	0.50	177.50
07/31/23	FRY	EMAILS TO/FROM M. SIROTA RE DS HEARING	0.20	141.00
07/31/23	MDS	REVIEW AMENDED DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION	0.90	1,080.00
07/31/23	FP	PREPARE FOR FILING NOTICE OF FILING OF REVISED EXHIBITS TO ORDER CONDITIONALLY APPROVING DISCLOSURE STATEMENT (.20); PREPARE AND EFILE NOTICE AND COORDINATE SERVICE (.20)	0.40	142.00
07/31/23	FRY	EMAIL WITH M. SIROTA RE DISCLOSURE STATEMENT HEARING	0.10	70.50
07/31/23	FRY	REVIEW REVISED DISCLOSURE STATEMENT FOR FILING	0.50	352.50
07/31/23	FRY	TELEPHONE FROM CHAMBERS RE DS HEARING	0.10	70.50
07/31/23	FP	PREPARE AND EFILE ORDER SHORTENING TIME AND PROPOSED ORDER TO SHORTEN TIME RE: DISCLOSURE ADEQUACY ORDER	0.50	177.50
07/31/23	FP	DOWNLOAD AND REVIEW SIGNED ORDER SHORTENING TIME RE: ADEQUACY OF DISCLOSURE STATEMENT (.20); COORDINATE SERVICE (.10)	0.30	106.50
07/31/23	ADM	REVIEW EMAILS RE: MOTION TO SHORTEN TIME FOR DS MOTION (0.1); REVIEW FILING OF SAME AND CORRESPOND WITH F. PISANO RE: SUBMISSION TO CHAMBERS (0.2)	0.30	142.50
07/31/23	FRY	REVIEW AND COMMENT ON APPLICATION TO SHORTEN TIME RE DS HEARING	0.20	141.00
FEE APPLICATION PREPARATION			14.60	7,010.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/23	MDS	REVIEW PROFESSIONAL FEE CHART	0.40	480.00
07/03/23	FP	PREPARE (.20) AND EFILE (.10) KROLL MAY MONTHLY FEE STATEMENT	0.30	106.50
07/03/23	ADM	REVIEW KROLL MFS (0.1); SEND TO F. PISANO FOR FILING (0.1)	0.20	95.00
07/03/23	FRY	REVIEW KROLL FEE STATEMENT FOR FILING	0.10	70.50
07/07/23	ADM	REVIEW JUNE FEES WITH ATTENTION TO PRIVILEGE IN PREPARATION OF MFS	1.50	712.50
07/11/23	ADM	REVIEW BRG STAFFING REPORT (0.2); FORWARD TO F. PISANO WITH INSTRUCTIONS FOR FILING (0.1)	0.30	142.50
07/11/23	FP	PREPARE BRG MAY MFS FOR FILING (.20); AND EFILE (.20); COORDINATE SERVICE (.10)	0.50	177.50
07/12/23	FRY	COORDINATE FILING OF CNO FOR K&E	0.10	70.50
07/13/23	FP	DRAFT CNO RE: H&B MAY MFS (.10) AND CIRCULATE FOR REVIEW (.10)	0.20	71.00
07/17/23	ADM	REVIEW AND COORDINATE FILING OF CNO RE: H&B FEES	0.20	95.00
07/17/23	FP	PREPARE (.10) AND EFILE (.10) CNO RE: 6TH MFS OF H&B	0.20	71.00
07/18/23	ADM	REVISE MFS	0.50	237.50
07/18/23	ADM	PREPARE JUNE MFS COVER SHEET	0.50	237.50
07/18/23	ADM	FURTHER REVIEW MFS WITH ATTENTION TO PRIVILEGE ISSUES (0.7); REVISE ACCORDINGLY (0.3)	1.00	475.00
07/18/23	FRY	REVIEW INVOICE FOR PRIVILEGE	0.50	352.50
07/18/23	ADM	CALL WITH F. YUDKIN RE: MFS	0.10	47.50
07/18/23	ADM	REVIEW FEE EXAMINER REPORT	0.20	95.00
07/19/23	ADM	REVIEW DRAFT CNO RE: KROLL MFS AND CORRESPOND WITH F. YUDKIN R: SAME	0.10	47.50
07/19/23	FP	PREPARE (.10) AND EFILE (.20) CNO RE: KROLL MAY MFS	0.30	106.50
07/19/23	ADM	REVISE CNO RE KROLL MFS (0.1); EMAIL CONFER WITH F. YUDKIN AND F. PISANO RE: FILING (0.1)	0.20	95.00
07/19/23	ADM	REVIEW MFS (0.2); FURTHER REVISE MFS (0.4)	0.60	285.00
07/19/23	FRY	REVIEW AND COMMENT ON DRAFT MONTHLY FEE STATEMENT	0.20	141.00
07/19/23	MDS	TELEPHONE FROM FEE EXAMINER	0.20	240.00
07/19/23	FP	DRAFT CNO RE: KROLL MAY MFS (.20); CIRCULATE FOR REVIEW (.10)	0.30	106.50
07/20/23	ADM	REVIEW MFS WITH ATTENTION TO POTENTIAL PRIVILEGE ISSUES/REDACTION (0.4); FINALIZE JUNE MFS FOR FILING (0.4)	0.80	380.00
07/20/23	FP	PREPARE TO FILE COLE SCHOTZ JUNE MFS, WITH EXHIBITS (.20) AND SEND FOR REVIEW (.10)	0.30	106.50
07/20/23	FP	PREPARE AND EFILE CS JUNE MFS, WITH EXHIBITS (.20); COORDINATE SERVICE (.10)	0.30	106.50

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/21/23	ADM	EMAIL ACCOUNTING RE PREPARATION OF FEE EXAMINER DATA	0.20	95.00
07/24/23	ADM	REVIEW DELOITTE MONTHLY FEE STATEMENTS FOR FILING (0.2); EMAIL TO CO-COUNSEL F. YUDKIN RE: SAME (0.1); EMAIL TO KE TEAM RE: SAME (0.1) EMAIL F. PISANO RE: FILING (0.1)	0.50	237.50
07/24/23	FP	PREPARE AND FILE DELOITTE (1) FIRST (MARCH) MFS (.20); (2) SECOND (APRIL) MFS; AND (3) THIRD (MAY) MFS; COORDINATE SERVICE (.10)	0.70	248.50
07/25/23	FP	PREPARE (.20) AND EFILE (.20) KROLL JUNE MFS; COORDINATE SERVICE (.10)	0.50	177.50
07/26/23	ADM	REVIEW H&B FEE STATEMENT FOR FILING (0.1); SEND TO F. PISANO FOR FILING AND EMAIL TO CO-COUNSEL HB RE SAME (0.1)	0.20	95.00
07/26/23	FRY	REVIEW BRG STAFFING REPORT (.1); EMAIL TO CO-COUNSEL RE SAME (.1)	0.20	141.00
07/26/23	FP	PREPARE (.20) AND EFILE (.20) BRG JUNE MFS WITH EXHIBITS; COORDINATE SERVICE (.10)	0.50	177.50
07/26/23	FP	PREPARE AND EFILE H&B JUNE MONTHLY FEE STATEMENT (.20); COORDINATE SERVICE (.10)	0.30	106.50
07/27/23	FP	PREPARE (.20) AND FILE (.20) MOELIS CERTIF. OF NO OBJECTION	0.40	142.00
07/27/23	ADM	REVIEW DATA FOR FEE EXAMINER (0.2); CORRESPONDENCE WITH F. YUDKIN AND FEE EXAMINER RE: SAME (0.2)	0.40	190.00
07/27/23	FP	PREPARE (.20) AND EFILE (.20) AMENDED H&B JUNE MFS; EMAILS RE: SERVICE (.10)	0.50	177.50
07/27/23	FRY	REVIEW AMENDED FEE STATEMENT FOR HAYNES AND BOONE FOR FILING	0.10	70.50

LITIGATION **11.80** **6,613.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/06/23	FRY	REVIEW DRAFT 9019 MOTION	0.50	352.50
07/06/23	FRY	EMAILS WITH CO-COUNSEL RE SCHEDULING ON ADVERSARY PROCEEDING	0.20	141.00
07/07/23	FRY	EMAILS RE FILING OF ADVERSARY COMPLAINT	0.20	141.00
07/07/23	FRY	EMAIL WITH CO-COUNSEL RE CONNECTICUT DEPARTMENT OF BANKING ADVERSARY PROCEEDING	0.20	141.00
07/07/23	ADM	REVIEW EMAILS FROM CO-COUNSEL HB RE ADV. PROC. FILING AND MOST RECENT DRAFT OF COMPLAINT (0.2); EMAIL CORRESPONDENCE WITH CO-COUNSEL RE: SAME (0.1)	0.30	142.50
07/07/23	ADM	FOLLOW UP EMAIL WITH CO-COUNSEL RE: ADV. PROC FILING	0.10	47.50
07/09/23	FRY	REVIEW REVISED 9019 MOTION	0.40	282.00
07/10/23	FRY	REVIEW VRAI NOM COMPLAINT FOR FILING	0.30	211.50

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/23	FRY	EMAIL WITH CO-COUNSEL RE STAY OF ADVERSARY PROCEEDING	0.10	70.50
07/10/23	ADM	CORRESPONDENCE WITH CO-COUNSEL HB RE: ADV PROCEEDING FILING (0.1); REVIEW ADVERSARY PROCEEDING (0.2); SEND TO F. PISANO FOR FILING (0.1); CALL WITH F. PISANO RE: SAME (0.1); DOWNLOAD AND SEND STAMPED FILED COPY TO CO-COUNSEL AND CORRESPOND RE: SERVICE (0.2)	0.70	332.50
07/10/23	FRY	EMAILS WITH CO-COUNSEL RE VRAI NOM ADVERSARY PROCEEDING	0.20	141.00
07/10/23	ADM	REVIEW ISSUES RELATED TO PRIMEBLOCK ADVERSARY ORDER ON MOTION TO SEAL (0.2); EMAIL WITH CO-COUNSEL HB RE: SAME (0.1)	0.30	142.50
07/10/23	FP	PREPARE (.10) NEW ADVERSARY COMPLAINT AGAINST VRAI NOM INVESTMENT LTD AND EFILE (.20); DOWNLOAD FILED COPY AND CIRCULATE TO A. MILLIARESSIS (.10)	0.40	142.00
07/10/23	FRY	EMAIL FROM COURT RE MOTION TO SEAL ON PRIMEBLOCK ADVERSARY	0.10	70.50
07/10/23	FRY	COORDINATE FILING OF 9019 MOTION	0.20	141.00
07/10/23	ADM	REVIEW FORM OF ORDER RE: PRIMEBLOCK MOTION TO SEAL (0.1); EMAIL CO-COUNSEL F. YUDKIN AND HB RE SAME (0.1); SUBMIT SAME TO CHAMBERS (0.1)	0.30	142.50
07/10/23	FP	REVIEW SUMMONS ISSUED IN ADVERSARY AGAINST VRAI NOM (.10) AND CIRCULATE TO A. MILLIARESSIS	0.20	71.00
07/11/23	ADM	REVIEW JOINT SCHEDULING ORDER IN DIGISTAR ADV. PROC. (0.2); EMAIL CORRESPONDENCE WITH CO-COUNSEL F. YUDKIN AND L. SISSON RE: SAME (0.1)	0.30	142.50
07/11/23	FRY	REVIEW SCHEDULING ORDER IN DIGISTAR CASE (.1); EMAIL TO CO-COUNSEL RE SAME (.1)	0.20	141.00
07/12/23	ADM	REVIEW DIGISTAR SCHEDULING ORDER FOR FILING AND EMAIL CORRESPONDENCE WITH L. SISSON RE: SAME (0.1); EMAIL WITH F. YUDKIN AND F. PISANO RE: FILING (0.1)	0.20	95.00
07/12/23	ADM	EMAIL WITH CO-COUNSEL L. SISSON RE: APPLICATION IN LIEU OF MOTION RE: RULE 4007 DEADLINE (0.1); REVIEW SAME (0.1); EMAIL CORRESPONDENCE WITH F. YUDKIN AND F. PISANO RE: FILING (0.1); CALL WITH CO-COUNSEL L. SISSON RE SAME (0.1); CALL WITH F. PISANO RE: FILING (0.1)	0.50	237.50
07/12/23	FRY	REVIEW APPLICATION IN LIEU RE DEADLINE TO FILE A COMPLAINT OBJECTING TO DISCHARGE	0.20	141.00
07/12/23	FP	PREPARE (.20) AND EFILE (.20) AGREED JOINT SCHEDULING ORDER IN DIGISTAR ADVERSARY	0.40	142.00
07/13/23	FP	PREPARE (.20) AND EFILE (.10) NOTICE OF WITHDRAWAL OF MOTION TO ENFORCE AUTO. STAY IN CONN. DEPT. OF BANKING ADV. CASE	0.30	106.50

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/13/23	ADM	REVIEW MOTION TO STAY CT BANKING ADV. PROC. (0.2); EMAIL TO F. PISANO WITH DOCUMENTS FOR FILING AND EMAIL WITH CO-COUNSEL HB RE SAME (0.1)	0.30	142.50
07/13/23	ADM	PREPARE NOTICE OF WITHDRAWAL OF INJUNCTION MOTION IN CT BANKING ADV. PROC (0.4); CORRESPOND WITH CO-COUNSEL HB RE SAME (0.1); EMAIL CORRESPONDENCE WITH F. PISANO RE: FILING (0.1)	0.60	285.00
07/13/23	FRY	REVIEW NOTICE OF WITHDRAWAL RE CT BANKING ADV. PROCEEDING	0.10	70.50
07/13/23	FP	PREPARE AND EFILE NOTICE OF MOTION FOR ORDER STAYING ADV. PROCEEDING (CONN. DEPT. OF BANKING) WITH MOL AND PROPOSED ORDER	0.30	106.50
07/17/23	FRY	EMAIL RE STIPULATION AND PROTECTIVE ORDER ON THREE ARROWS	0.10	70.50
07/18/23	MDS	REVIEW ANSWER TO AMENDED COMPLAINT	0.60	720.00
07/18/23	ADM	REVIEW APPLICATION IN LIEU FOR CONFIDENTIALITY STIP AND PROTECTIVE ORDER AND REVISE ORDER (0.3); EMAIL WITH CO-COUNSEL J. CHAVEZ AND PARALEGAL F. PISANO RE: FILING (0.1)	0.40	190.00
07/18/23	FP	PREPARE (.20) APPLICATION IN LIEU AND CONFIDENTIALITY STIPULATION/PROTECTIVE ORDER FOR FILING; EFILE (.20); DOWNLOAD FILED COPY (.10) AND COORDINATE SERVICE (.10)	0.60	213.00
07/21/23	FP	PREPARE (.20) AND EFILE (.20) ANSWER IN ADVERSARY 23-1144 (COMMITTEE V. BLOCKFI); ATTEND TO SERVICE (.10)	0.50	177.50
07/21/23	ADM	REVIEW ANSWER TO UCC COMPLAINT AND PREPARE FINALIZED VERSION OF SAME (0.2); EMAIL WITH CO-COUNSEL HB RE FILING AND SERVICE (0.1); EMAIL CORRESPONDENCE WITH F. PISANO RE: SERVICE (0.1)	0.30	142.50
07/21/23	FRY	REVIEW DRAFT ANSWER TO COMPLAINT RE WASHINGTON SEIZURE WARRANTS (.2); EMAILS WITH CO-COUNSEL RE SAME (.2)	0.40	282.00
07/25/23	FRY	CONFER WITH CO-COUNSEL RE PRE TRIAL (.2); EMAILS RE SAME (.1)	0.30	211.50
07/27/23	FRY	REVIEW PRIME BLOCK SCHEDULING ORDER	0.20	141.00
07/27/23	ADM	REVIEW CONSENT ORDER RE: PRIMEBLOCK (0.1); REVIEW LOCAL RULES RELATED TO SAME (0.1); EMAIL CORRESPONDENCE TO F. YUDKIN AND CO-COUNSEL HB RE SAME (0.1)	0.30	142.50

PLAN OF REORGANIZATION	42.80	46,812.00
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/23	MDS	REVIEW TRANSCRIPT	0.90	1,080.00
07/01/23	MDS	CORRESP. TO ATTORNEY/CO-COUNSEL M. SLADE RE: SUBPOENAS	0.50	600.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/23	MDS	CONFERENCE WITH J. SUSSBERG RE: PREPARATION FOR CONFERENCE AND REVIEW ALL PLEADINGS	3.10	3,720.00
07/02/23	WAW	REVIEW AND RESPOND TO EMAILS RE: UCC MEET AND CONFER ON HEARING AND DISCOVERY SCHEDULING FOR PENDING MATTERS	0.20	190.00
07/02/23	MDS	CORRESP. TO ADVERSARY UCC RE: PROPOSED SCHEDULE	0.30	360.00
07/02/23	MDS	TELEPHONE FROM ATTORNEY/CO-COUNSEL J. SUSSBERG RE: PROPOSED SCHEDULE - PLAN ISSUES	1.40	1,680.00
07/02/23	MDS	TELEPHONE FROM ATTORNEY/CO-COUNSEL R. KANOWITZ AND KE TEAM RE: SETTLEMENT	2.50	3,000.00
07/02/23	MDS	TELEPHONE TO ADVERSARY R. STARK RE: MEET AND CONFER	1.00	1,200.00
07/02/23	MDS	CORRESP. TO ADVERSARY R. STARK RE: MEET AND CONFER	0.20	240.00
07/04/23	MDS	REVIEW 9019 OUTLINE	1.40	1,680.00
07/04/23	MDS	REVISE RESPONSE TO DESIGNATIONS	0.60	720.00
07/04/23	MDS	REVISE LETTER TO R. STARK RE: CONFIDENTIALITY	0.20	240.00
07/04/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL J. SUSSBERG RE: 9019	0.80	960.00
07/04/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL J. SUSSBERG RE: POTENTIAL SETTLEMENT	0.70	840.00
07/06/23	FRY	CALL WITH CO-COUNSEL RE PLAN EXCLUSIVITY	0.40	282.00
07/06/23	FRY	REVIEW DRAFT OF OBJECTION TO EXCLUSIVITY EXTENSION	0.40	282.00
07/06/23	MDS	REVIEW DRAFT 9019 - PROVIDE COMMENTS	1.70	2,040.00
07/07/23	MDS	REVIEW REPLY TO EXCLUSIVITY OBJECTION WITH COMMENTS	0.90	1,080.00
07/07/23	MDS	REVIEW REVISED RESPONSE TO EXCLUSIVITY OBJECTION	0.60	720.00
07/07/23	MDS	CORRESP. TO ATTORNEY/CO-COUNSEL J. SUSSBERG RE: PREPARATION FOR JULY 13TH	0.30	360.00
07/07/23	MDS	REVIEW EMAIL CHAIN ON UCC DOCUMENT REQUEST	0.40	480.00
07/08/23	MDS	CORRESP. TO ATTORNEY/CO-COUNSEL RE: COMMENTS TO UCC SEALING MOTION	0.70	840.00
07/08/23	MDS	REVIEW REVISED SETTLEMENT MOTION AND COMMENT	0.90	1,080.00
07/08/23	MDS	CORRESP. TO CLIENT RE: REVISIONS TO EXCLUSIVITY RESPONSE	0.50	600.00
07/09/23	MDS	REVIEW REVISED 9019	0.80	960.00
07/10/23	MDS	REVIEW RESPONSE TO MOTION TO SEAL	0.40	480.00
07/10/23	ADM	EMAIL CORRESPONDENCE (MULTIPLE) WITH CO-COUNSEL RE: FILING OF 9019 MOTION AND TRANSMISSION OF UNREDACTED EXHIBITS (0.3); REVIEW 9019 MOTION FOR FILING (0.4); PREPARE EMAIL TO COURT ATTACHING UNREDACTED EXHIBITS (0.2); PREPARE AND SEND EMAIL TO UST RE: UNREDACTED EXHIBITS (0.2)	1.10	522.50
07/10/23	MDS	REVIEW REVISED REPLY TO EXCLUSIVITY OBJECTION	0.40	480.00
07/10/23	FRY	CONFERENCE CALL RE 9019, RESPONSE TO EXCLUSIVITY AND RELATED FILINGS	0.50	352.50

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07/10/23	FP	PREPARE AND EFILE REPLY MEMO ISO DEBTORS SECOND MOTION TO EXTEND EXCLUSIVITY	0.20	71.00
07/10/23	ADM	REVIEW RESPONSE TO EXCLUSIVITY MOTION (0.1); REVIEW RESPONSE TO MOTION TO SEAL (0.1); CORRESPOND WITH F. PISANO RE: FILING (0.1); REVIEW DOCKET AND RESPOND RE: FILING QUESTIONS (0.2)	0.50	237.50
07/10/23	WAU	REVIEW MOTION TO APPROVE INSIDER SETTLEMENT AND RELATED ATTACHMENTS	0.70	665.00
07/10/23	FP	PREPARE AND FILE DEBTORS MOTION FOR AN ORDER AUTHORIZING FILING UNDER SEAL CERTAIN INFORMATION IN CONNECTION WITH MOTION AUTHORIZING AND APPROVING SETTLEMENT WITH INSIDERS	0.20	71.00
07/10/23	FRY	COORDINATE FILING OF OBJECTION TO UNSEAL REPORT	0.10	70.50
07/10/23	MDS	CORRESP. TO ATTORNEY/CO-COUNSEL M. SLADE RE: 9019 AND UNSEAL	0.20	240.00
07/10/23	FRY	COORDINATE FILING OF REPLY TO EXCLUSIVITY OBJECTION	0.20	141.00
07/11/23	ADM	CORRESPONDENCE WITH F. PISANO AND REVIEW DOCKET RE: LINKED DOCUMENTS FOR EXCLUSIVITY MOTION	0.30	142.50
07/11/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL J. SUSSBERG RE: PENDING MOTIONS	0.50	600.00
07/11/23	MDS	REVIEW FINAL VERSIONS OF 9019 AND RESPONSE TO UCC	1.40	1,680.00
07/11/23	MDS	REVIEW JPL SUBMISSION	0.40	480.00
07/12/23	ADM	FOLLOW UP EMAIL CORRESPONDENCE WITH UST RE: UNREACTED EXHIBITS TO 9019 MOTION	0.20	95.00
07/12/23	MDS	REVIEW SUPPLEMENTAL OBJECTION TO EXCLUSIVITY	0.40	480.00
07/13/23	FRY	EMAIL TO CHAMBERS RE EXCLUSIVITY BRIDGE ORDER	0.10	70.50
07/14/23	MDS	REVIEW/REVISE TERM SHEET	0.60	720.00
07/14/23	WAU	REVIEW THREE ARROWS DISCOVERY REQUESTS	0.20	190.00
07/14/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL KE RE: SETTLEMENT	0.70	840.00
07/14/23	WAU	REVIEW CONFIDENTIALITY STIPULATION AND EMAILS RE: SAME	0.30	285.00
07/14/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL J. SUSSBERG RE: SETTLEMENT OPTIONS	0.70	840.00
07/15/23	FRY	EMAIL RE SETTLEMENT CONFERENCE WITH JUDGE	0.10	70.50
07/16/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL J. SUSSBERG RE: SETTLEMENT ISSUE	0.50	600.00
07/16/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL CS TEAM RE: SETTLEMENT AND COURT HEARING	0.80	960.00
07/17/23	MDS	TELEPHONE FROM ATTORNEY/CO-COUNSEL J. SUSSBERG RE: MEDIATION WITH JUDGE KAPLAN	0.90	1,080.00
07/17/23	MDS	REVIEW EMAILS ON SETTLEMENT TERM SHEET	0.70	840.00
07/17/23	MDS	REVIEW SETTLEMENT TERM SHEET AND COMMENT	0.60	720.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/17/23	MDS	TELEPHONE FROM ATTORNEY/CO-COUNSEL R. KANOWITZ RE: MEDIATION WITH JUDGE KAPLAN	0.60	720.00
07/18/23	FRY	REVIEW LATEST SETTLEMENT TERM SHEET	0.20	141.00
07/18/23	MDS	WORK ON BLOCKFI SETTLEMENT	0.90	1,080.00
07/18/23	FRY	EMAILS RE SCHEDULING OF EXLCUSIVITY MOTION	0.20	141.00
07/18/23	MDS	EXTENSIVE EMAIL EXCHANGE ON SETTLEMENT	0.30	360.00
07/18/23	MDS	REVIEW AND REVISE SETTLEMENT TERM SHEET	0.60	720.00
07/18/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL J. SUSSBERG RE: MEDIATION	0.70	840.00
07/19/23	FRY	REVIEW THE LATEST SETTLEMENT TERM SHEET	0.20	141.00
07/19/23	MDS	TELEPHONE FROM ATTORNEY/CO-COUNSEL J. SUSSBERG RE: MEDIATION	0.40	480.00
07/19/23	FRY	CONFERENCE WITH COURT RE SCHEDULING OF EXCLUSIVITY MOTION	0.10	70.50
07/19/23	FRY	CALL FROM CO-COUNSEL RE BRIDGE ORDER	0.10	70.50
07/20/23	ADM	REVIEW BRIDGE ORDER AND DOCKET RELATED TO SAME (0.2); FINALIZE FORM OF ORDER AND SUBMIT TO CHAMBERS (0.1)	0.30	142.50
07/20/23	MDS	REVIEW EMAIL - OPEN SETTLEMENT ISSUE	0.20	240.00
07/20/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL J. SUSSBERG RE: SETTLEMENT AGREEMENT	0.50	600.00
07/20/23	FRY	REVIEW BRIDGE ORDER ON EXCLUSIVITY	0.20	141.00
07/20/23	MDS	REVIEW AND REVISE SETTLEMENT AGREEMENT	0.40	480.00
07/26/23	FP	PREPARE (.20) AND FILE (.10) NOTICE OF AMENDED CONFIRMATION TIMELINE; COORDINATE SERVICE (.10)	0.40	142.00
07/28/23	MDS	REVIEW EMAIL CORRESPONDENCE WITH M. SLADE AND BROWN RUDNICK	0.40	480.00
07/29/23	FRY	EMAILS WITH CO-COUNSEL RE AMENDED PLAN AND DS	0.20	141.00
07/31/23	FRY	REVIEW REVISED PLAN FOR FILING	0.60	423.00

REPORTING 1.40 707.00

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/21/23	FP	PREPARE (.40) AND EFILE (.40) MOR'S AND SUPPORTING DOCUMENTS FOR 9 ENTITIES	0.80	284.00
07/21/23	FRY	REVIEW MONTHLY OPERATING REPORTS	0.50	352.50
07/21/23	FRY	CALL WITH BRG RE MOR	0.10	70.50

TAX ISSUES 0.10 70.50

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/19/23	FRY	CALL FROM IRS	0.10	70.50

TRAVEL TIME 1.50 900.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/13/23	MDS	TRAVEL TO COURT	1.50	900.00
TOTAL HOURS			111.20	

PROFESSIONAL SERVICES: \$94,027.50

TIMEKEEPER SUMMARY

<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Andreas D. Milliaressis	Associate	18.30	475.00	8,692.50
Felice R. Yudkin	Member	18.20	705.00	12,831.00
Frances Pisano	Paralegal	18.80	355.00	6,674.00
Michael D. Sirota	Member	1.50	600.00	900.00
Michael D. Sirota	Member	53.00	1,200.00	63,600.00
Warren A. Usatine	Member	1.40	950.00	1,330.00
Total		111.20		\$94,027.50

COST DETAIL

<u>DATE</u>	<u>Description</u>	<u>QUANTITY</u>	<u>AMOUNT</u>
07/10/23	FILING FEES	1.00	350.00
07/11/23	PHOTOCOPY /PRINTING/ SCANNING	14.00	2.80
07/11/23	PHOTOCOPY /PRINTING/ SCANNING	3.00	0.60
07/13/23	PHOTOCOPY /PRINTING/ SCANNING	12.00	2.40
07/14/23	TRAVEL - CAR SERVICE	1.00	2,271.11
07/17/23	PHOTOCOPY /PRINTING/ SCANNING	16.00	3.20
07/17/23	PHOTOCOPY /PRINTING/ SCANNING	2.00	0.40
Total			\$2,630.51

COST SUMMARY

<u>Description</u>	<u>AMOUNT</u>
PHOTOCOPYING / PRINTING / SCANNING	9.40
TRAVEL - CAR SERVICE	2,271.11
FILING FEES	350.00
TOTAL COSTS	\$2,630.51

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TOTAL SERVICES AND COSTS: \$ 96,658.01